

EXHIBIT G

Mary Rose Alexander
Direct Dial: (312) 876-7672
mary.rose.alexander@lw.com

233 S. Wacker Drive, Suite 5800
Chicago, Illinois 60606
Tel: +1.312.876.7700 Fax: +1.312.993.9767
www.lw.com

LATHAM & WATKINS LLP

October 7, 2011

VIA EMAIL AND US MAIL

Evan Westerfield
Sidley Austin, LLP
One South Dearborn Street
Chicago, IL 60603

FIRM / AFFILIATE OFFICES

Abu Dhabi	Moscow
Barcelona	Munich
Beijing	New Jersey
Boston	New York
Brussels	Orange County
Chicago	Paris
Doha	Riyadh
Dubai	Rome
Frankfurt	San Diego
Hamburg	San Francisco
Hong Kong	Shanghai
Houston	Silicon Valley
London	Singapore
Los Angeles	Tokyo
Madrid	Washington, D.C.
Milan	

File No. 042400-0043

Re: NCR's October 4, 2011 Interrogatories and Request for Production

Dear Evan:

Thank you for your time today to meet and confer with GP, Glatfelter and WTM I regarding the October 4, 2011 Interrogatories and Requests for Production relating to Fox River Group ("FRG") costs served on each of GP, Glatfelter and WTM I. Each set of discovery includes two interrogatories and eight document request relating to thirty-one contractors hired by the FRG. Glatfelter and WTM I have also received extensive deposition notices regarding FRG costs, identifying as many as thirty-seven topics related to amounts paid by the FRG (of which NCR and API were members). As we discussed, we believe this discovery – served on the last possible day to do so before the discovery cut-off – is overly broad, burdensome and not likely to lead to the discovery of admissible evidence not already in NCR's possession. This is particularly true in light of the fact that NCR and API were part of the FRG when each of the costs you seek discovery about was incurred and expressly approved such costs.

During our meet and confer, you indicated that the primary purpose of this discovery is to obtain our position regarding the purpose of each set of costs incurred by these thirty-one contractors. We noted, and you agreed, that because these contractors were hired jointly by the members of the FRG – including NCR and API – for a common purpose, that the FRG members should have had the same position as to the common purpose for which such contractor was hired. Because that is likely the case, we suggested that you provide us NCR's position as to the purpose for which the FRG retained each of the thirty-one contractors and we will let you know if we disagree. You agreed to consider this option. Please let us know promptly if this is an acceptable method for NCR to obtain the discovery it seeks – discovery that GP, Glatfelter and WTM I believe is unnecessary.

In considering this proposal, we remind you that when the issue of whether NCR is entitled to discovery on the FRG costs that it largely failed to challenge in connection with our

LATHAM & WATKINS LLP

motion for summary judgment, NCR told that court that any possible FRG discovery would be minimal. Specifically:

Mr. McAtee: May not be, you know, a lot of discovery that's needed on that issue. I think we just have a few items that we want to investigate.

The Court: Again, I would encourage if this gets out of hand, if-- Mr. McAtee has said that these are a narrow group within the Fox River Group costs. If it appears that this is again for purposes of harassment, I have to entertain a motion for protective order or more specific motion on it. (Aug. 1, 2011 Hearing Transcript at 16-17.)

We look forward to your response and hope that we can avoid motion practice on these issues at this late date.

Very truly yours,



Mary Rose Alexander
of LATHAM & WATKINS LLP

cc: John E. Burgess
Michael L. Hermes
Karl S. Lytz
Nancy Peterson
David Mandelbaum
Sabrina Mizrachi